

7. Defendant is without sufficient information at this time to admit monetary figures as plead in paragraphs III-6-9 of the complaint.

8. Defendants admit to the facts plead in paragraphs III-10-13 but deny the alleged federal jurisdiction facts plead in those paragraphs.

9. Defendant denies the facts plead in paragraphs IV-14-23 of the complaint.

10. Defendant denies the facts plead in paragraphs IV-24-25 of the complaint.

11. Defendant is without sufficient information to admit or deny the facts plead in paragraphs IV-26 of the complaint.

12. Defendant denies the facts plead in paragraphs IV-27-34 of the complaint.

13. Defendant denies the facts plead in paragraphs IV-35-37 of the complaint.

14. Defendant denies the facts plead in paragraphs IV-38-48 of the complaint.

15. Defendant denies the facts plead in paragraphs V-49-54 of the complaint.

16. Defendant denies the facts plead in paragraphs V-55-65 of the complaint.

17. Defendant denies the facts plead in paragraphs V-66-87 of the complaint.

18. Defendant denies the facts plead in paragraphs VI-88-102 of the complaint.

19. Defendant denies the facts plead in paragraphs VII-103-118 of the complaint.

20. Defendant is without sufficient knowledge to admit or deny the facts plead in paragraphs VIII-119-135 of the complaint.

21. Defendant is without sufficient knowledge to admit or deny the facts plead in paragraphs IX-136-151 of the complaint.

AFFIRAMTIVE DEFENSES

22. Defendants plead the affirmative defenses of limitations, collateral estoppel and res judicata

Respectfully Submitted,

/s/ C. Davis Chapman

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ATTORNEYS FOR DEFENDANT
YUANLI TANG

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record via electronic service on this 24th day of December, 2024

Conghua Yan via electronic service

/s/ C. Davis Chapman